

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CRESCIT MORTGAGE CAPITAL, LLC,
a Delaware limited liability company,

Plaintiff,

v.

EMERALD BAY APARTMENTS, LLC, a
Washington limited liability company, and
CHRISTOPHER S. ROBISON, an
individual,

Defendants.

No. 22-cv-10263 (DEH)

**NOTICE OF MOTION AND
MOTION FOR DEFAULT
JUDGMENT**

Please take notice that, upon the annexed declaration of Christopher J. Paoella and attached exhibits, and all prior papers and proceedings in this case, Plaintiff Crescit Mortgage Capital, LLC, by counsel, will move the court, at such time and date as the Court may designate:

1. For judgment by default against Defendants Emerald Bay Apartments, LLC and Christopher S. Robison, pursuant to Fed. R. Civ. P. 55(b)(2) and Local Rule 55.2(b); and

2. For an Order striking Defendants' Answer with Counterclaims and dismissing all counterclaims with prejudice, pursuant to Fed. R. Civ. P. 16 and 41.

Answering papers, if any, shall be served on the undersigned no later than fourteen days after service of the moving papers in accordance with Local Rule 6.1(b), or at such other time as the Court may direct.

Dated: New York, New York
August 5, 2024

REICH & PAOLELLA LLP
By: /s/ Christopher J. Paoella
Christopher J. Paoella, Esq.
111 Broadway, Suite 2002
New York, NY 10006
212-804-7090
cpaoella@reichpaollella.com

To:

Christopher S. Robison
114 Channel Road
Eastsound, WA 98245
lendingadvantage@gmail.com

Emerald Bay Apartments, LLC
20 Jack and Jill Place #181
Deer Harbor, WA 98243
lendingadvantage@gmail.com